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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	No. 3:13-
	)	
Plaintiff,	)	<b><u>AFFIDAVIT OF KIMBERLY E.</u></b>
	)	<b><u>DALLAS IN SUPPORT OF</u></b>
vs.	)	<b><u>VERIFIED COMPLAINT FOR</u></b>
	)	<b><u>FORFEITURE IN REM</u></b>
	)	
CHRYSLER 300 VEHICLE, VIN	)	
NUMBER 2C3KA43R38H244034,	)	
	)	
Defendant.	)	
_____	)	

I, Kimberly E. Dallas, United States Postal Inspector, being duly sworn, depose and state the following:

1. I am a United States Postal Inspector, assigned to investigate the unlawful theft of United States Mail or items shipped through the United States Mail. I have been a Postal Inspector since August 2010. As part of my duties, I investigate incidents where

United States mail or item in the United States Mail has been stolen from its mail route in violation of Title 18, United States Code, Section 1708, Mail Theft.

2. I am currently assigned to the Seattle Division, specifically to the Anchorage Domicile, which is responsible for the investigating of theft of the United States Mails.

3. During my career I have participated in several investigations where items in the mail stream or U.S. Mail has been stolen.

4. On or between June 25, 2012 to June 27, 2012, \$60,000.00 was mailed from Anchorage, Alaska to Saint Paul, Alaska via Registered Mails RB 540 585 661 US, RB 540 585 675 US, and RB 540 585 689 US, each in the amount of \$20,000.00 by Northrim Bank, destined for The City of Saint Paul. The Registered Mail pieces were placed inside a green mail bag for shipping.

5. In July 2012, a postal employee at the Anchorage Processing and Distribution Center informed the United States Inspection Service of the disappearance of Registered Mails RB 540 585 661 US, RB 540 585 675 US, and RB 540 585 689 US.

6. Through the course of this investigation, Inspectors identified two Alaska Central Express Air Cargo (ACE) employees suspected to be involved in the theft of Registered Mails RB 540 585 661 US, RB 540 585 675 US, and RB 540 585 689 US. The employees were identified as Star Matulino and Vili Talivaa.

7. On July 28, 2012, suspect Vili Talivaa, who was employed at ACE, was interviewed by Inspector Dallas and Investigator Renee Mackey of the Anchorage  
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Airport Police Department. Vili Talivaa confessed to taking \$20,000.00 with the help of co-worker Star Matulino from a mail piece. He confessed to using \$16,000.00 of the money to purchase a used Chrysler 300. He stated the rest of the money was for personal use. Vili Talivaa turned over custody of a Chrysler 300 bearing VIN number 2C3KA43R38H244034 to Inspector Dallas for possible restitution purposes. Inspector Dallas seized the vehicle where it is currently being stored at the United States Postal Service Vehicle Maintenance Facility in Anchorage, AK.

8. On July 31, 2012, an interview was conducted with Star Matulino by Inspector Dallas and Investigator Mackey. Star Matulino confessed to taking a total of \$60,000.00 from a mail piece. Star Matulino stated Vili Talivaa took \$20,000.00 and Star Matulino kept \$40,000.00.

9. On December 18, 2012 Star Matulino plead guilty to mail theft in Case 3:12-cr-00081-TMB at Docket 48.

10. On December 18, 2012 Vili Talivaa plead guilty to mail theft in Case 3:12-cr-00081-TMB at Docket 50.

11. Based on the aforementioned facts, I believe there is probable cause that the Chrysler 300 bearing VIN number 2C3KA43R38H244034 constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1708 (Mail Theft) and is therefore subject to civil forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), 1956(c)(7).

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EXECUTED on April 15, 2013 in Anchorage, Alaska.

Kimberly E. Dallas

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United States Postal Inspector

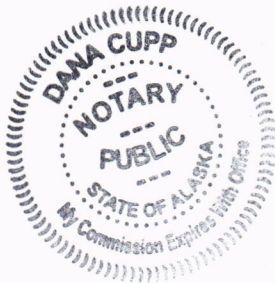
SUBSCRIBED AND SWORN TO before me on April 15, 2013 in Anchorage, Alaska.

Dana Cupp

NOTARY PUBLIC, State of Alaska

My commission expires:

W/office



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